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KURT R. ELLIS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KURT R. ELLIS,

Plaintiff,

vs.

EVERGREEN MONEYSOURCE
MORTGAGE COMPANY dba EVERGREEN
HOME LOANS,

Defendant.

Case No.: **2:16-cv-01580-RFB-CWH**

**STIPULATION TO CONTINUE
DISCOVERY DEADLINES**

[Third Request]

Pursuant to Local Rule 26-4 of the United States District Court for the District of Nevada, Defendant Evergreen MoneySource Mortgage Company dba Evergreen Home Loans (“Defendant”), and Plaintiff Kurt Ellis (“Plaintiff”), by and through their respective counsel, hereby submit this stipulation to extend the remaining discovery deadline in this case. This is the third such request made by the parties.

A. Statement Specifying Discovery Completed

Thus far, Plaintiff has served:

1. Initial disclosures

2. Requests for admissions
3. Requests for production of documents
4. Interrogatories, and
5. Deposition notice (vacated subject to rescheduling pending entry of this order)

Thus far, Defendant has served:

1. Initial disclosures
2. Requests for admissions
3. Requests for production of documents, and
4. Interrogatories, and
5. Deposition notice (vacated subject to rescheduling pending entry of this order)

B. Specific Description of Discovery to Be Completed

1. Deposition of Defendant Evergreen 30(b)(6) witness
2. Deposition of Plaintiff Kurt Ellis

C. Reasons Why Discovery Has not Been Completed

The parties have been and continue to be in negotiations for potential settlement of this case. In the interim and subject thereto, the parties have worked diligently to pursue and complete discovery. The undersigned counsel for Defendant and Plaintiff request this stipulation for the following reasons:

- The parties seek to set the depositions a few weeks outside the discovery cut-off date (of July 10, 2017)

Based thereon, counsel for Plaintiff agreed and stipulates herein to the requested continuance of the deposition and discovery deadline.

The last stipulated day to submit a request for an extension of the discovery deadline was April 18, 2017. This stipulation and request for a discovery extension is submitted in good faith.

D. Proposed Schedule for Completing Discovery

The parties request that the following deadlines be extended as follows:

1. **Discovery Deadlines:** The discovery deadline will be extended from July 10, 2017 to August 10, 2017.
2. **Dispositive Motions:** The deadline for filing dispositive motions shall be extended from August 11, 2017 to September 11, 2017.

IT IS SO STIPULATED.

Dated:

/s/ David H. Krieger, Esq.
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2:16-cv-01580-RFB-CWH

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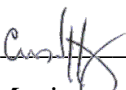
/s/ Jeffrey S. Allison, Esq.
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Attorney for Defendant
**EVERGREEN MONEYSOURCE
MORTGAGE COMPANY**

ORDER

Based on the foregoing, IT IS HEREBY ORDERED that the parties' stipulation to extend discovery deadline (Dkt. No. 22) is granted.

DATED: June 9, 2017



U.S. Magistrate Judge